

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

ANTHONY TRUPIA,

Plaintiff,

v.

CASE NO. CIV-24-498-SLP

HERITAGE HARD ASSETS LLC; KYLE PATTON, individually as Manager/Officer of HERITAGE HARD ASSETS LLC; HL VENTURES, an unregistered New York company, REAGAN GOLD GROUP, LLC; STEVE FRANCIS, individually as Manager/Officer of REAGAN GOLD GROUP, LLC; WORLD HARVEST CHURCH, INC.; ROD PARSLEY, individually as Manager/Officer of WORLD HARVEST CHURCH, INC.; SOUTH BAY GALLERIES LLC; BRANDON MENDELSON, individually as Manager/Officer of SOUTH BAY GALLERIES LLC; TELNYX LLC; DAVID CASEM, individually as Manager/Officer of TELNYX, LLC; IAN EITHER, individually as Manager/Officer of TELNYX LLC; JAMES WHEDBEE, individually as Manager/Officer of TELNYX LLC; MANDI MENA, individually as Manager/Officer of TELNYX LLC; ONVOY LLC; BRETT SCORZA, individually as Manager/Officer of ONVOY, LLC; JAMES HYNES, individually as Manager/Officer of ONVOY, LLC; G Edwards Evans, individually as Manager/Officer of ONVOY, LLC; MATTHEW CARTER JR, individually as Manager/Officer of ONVOY, LLC; LEVEL 3 COMMUNICATIONS, LLC; JEFF STOREY, individually as Manager/Officer of LEVEL 3 COMMUNICATIONS, LLC; ZEBERSKY PAYNE SHAW LEWENZ, a Florida law firm; ZACHARY D. LUDENS, individually as an attorney of ZEBERSKY PAYNE SHAW LEWENZ; and DOES 1 through 100, inclusive,

Defendants.

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**CERTIFICATE OF INTERESTED PERSONS AND CORPORATE  
DISCLOSURE STATEMENT**

Defendants, Heritage Hard Assets LLC, Kyle Patton, Zachary D. Ludens, and Zebersky Payne Shaw Lewenz, LLP (“Defendants”), by and through their undersigned counsel, file this Certificate of Interested Persons and Corporate Disclosure Statement pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, and states as follows:

1) The name of each person, attorney, association of persons, firm, law firm, partnership, and corporation that has or may have an interest in the outcome of this action—including subsidiaries, conglomerates, affiliates, parent corporations, publicly-traded companies that own 10% or more of a party’s stock, and all other identifiable legal entities related to *any* party in the case:

- A. Heritage Hard Assets, LLC – Defendant
- B. Kyle Patton of Day One Consulting (50% member of Hertiage Hard Assets, LLC)  
– Defendant
- C. Michael Cascone of MJC World Enterprises (50% member of Heritage Hard Assets, LLC)
- D. Zebersky Payne Shaw Lewenz, LLP – Defendant/Counsel for Defendant
- E. Zachary D. Ludens of Zebersky Payne Shaw Lewenz, LLP – Defendant/Counsel  
for Defendant Heritage Hard Assets LLC, Kyle Patton, Zebersky Payne Shaw  
Lewenz, Zachary D. Ludens
- F. HLV Ventures – Defendant
- G. Mark Banner of Hall, Estill, Hardwick, Gable, Golden & Nelson, P.C. – Attorney  
for Defendant HLV Ventures
- H. Aaron C. Tifft of Hall, Estill, Hardwick, Gable, Golden & Nelson, P.C. – Attorney

for Defendant HLV Ventures

- I. Reagan Gold Group, LLC – Defendant
- J. Steve Francis individually as Manager/Officer of Reagan Gold Group, LLC – Defendant
- K. World Harvest Church, Inc. – Defendant
- L. Rod Parsley as Manager/Officer of World Harvest Church, Inc. – Defendant
- M. South Bay Galleries LLC – Defendant
- N. Brandon Mendelson individually as Manager/Officer of South Bay Galleries, LLC – Defendant
- O. TELNYX LLC – Defendant
- P. David Casem individually as Manager/Officer of TELNYX LLC – Defendant
- Q. Ian Either individually as Manager/Officer of TELNYX LLC – Defendant
- R. James Whedbee individually as Manager/Officer of TELNYX LLC – Defendant
- S. Mandi Mena individually as Manager/Officer of TELNYX LLC – Defendant
- T. Onvoy LLC – Defendant
- U. Nicholas V. Merkley of GABLEGOTWALS – Attorney for Defendant Onvoy, LLC
- V. Brett Scorza individually as Manager/Officer of Onvoy, LLC - Defendant
- W. James Hynes individually as Manager/Officer of Onvoy, LLC - Defendant
- X. G Edwards Evans individually as Manager/Officer of Onvoy, LLC – Defendant
- Y. Matthew Carter Jr., individually as Manager/Officer of Onvoy, LLC – Defendant
- Z. Level 3 Communications, LLC – Defendant
- AA. Jeff Storey individually as Manager/Officer of Level 3 Communications, LLC – Defendant

BB. Anthony Trupia – Plaintiff

2) The name of every other entity whose publicly-traded stock, equity, or debt may be substantially affected by the outcome of the proceedings:

A. None other than those specified in response No. 1 above.

I hereby certify that I am unaware of any actual or potential conflict of interest involving the district judge and magistrate judge assigned to this case and will immediately notify the Court in writing on learning of any such conflict.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May \_\_\_\_, 2024, I filed the attached documents with the Court's CM/ECF system and served the attached document by First Class U.S. Mail and Email on the following, who are not registered participants of the Electronic Filing System:

Anthony Trupia, 605 SE 21<sup>st</sup> Street  
Oklahoma City, OK 73129  
[trupiaar@gmail.com](mailto:trupiaar@gmail.com)

Dated: May 20, 2024

Respectfully submitted,

**ZEBERSKY PAYNE SHAW LEWENZ LLP**

By: /s/ Zachary D. Ludens  
Zachary Dean Ludens  
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